

November 28, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Compliance Letter of Midwest Wireless Holdings L.L.C.  
**WC Docket No. 05-196**

Dear Ms. Dortch:

Midwest Wireless Holdings L.L.C. ("Midwest Wireless"), in response to the Commission's June 3, 2005, VoIP E911 Order ("Order") and the Public Notice issued by the Enforcement Bureau on November 7, 2005 ("Public Notice"), submits this Compliance Letter to advise the Commission of the status of Midwest Wireless' efforts to comply with Commission Rule 9.5(e).<sup>1</sup>

By way of background, Midwest Wireless is a CMRS provider operating under FCC authority in the rural areas of Southern Minnesota, Iowa and Western Wisconsin. Midwest Wireless currently holds the CMRS license in primarily rural areas: Minnesota RSAs 7 – 10; the Rochester, MN MSA; Iowa RSAs 3, 6, 11-16; and Wisconsin RSA 5. (the "Midwest Footprint"). Within the Midwest Wireless Footprint, Midwest Wireless recently began utilizing Voice over Internet Protocol ("VoIP") technology in order to offer its wireless subscribers an integrated service feature to be used in connection with their wireless device. The use of VoIP technology allows Midwest Wireless to offer its customers the use of a VoIP enabled home or office phone in connection with the wireless device. The customer utilizes only one phone number, one voicemail, etc. This VoIP service feature offering is branded oneWave. It is important to note that Midwest Wireless only markets to, and accepts, oneWave subscribers who identify a Principal Place of Use ("PPU") within the Midwest Footprint.

In September 2005, Midwest Wireless selected Intrado, Inc. ("Intrado") to provide a VoIP V-9-1-1 Mobility Services Solution. Pursuant to the Parties' agreement, Intrado is obligated to provide a V911 service that supports and adheres to the requirements of the

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<sup>1</sup> Pursuant to the Commission's prior Public Notices, Midwest Wireless submitted two status reports concerning Midwest Wireless' efforts to notify its subscribers of the limitations associated with its oneWave feature, and to obtain affirmative acknowledgments from those subscribers stating that they fully understand those limitations. The requisite status reports identifying 100% compliance were submitted electronically on September 1, 2005 and September 22, 2005.

Order ("the Service") within the Midwest Footprint and selected MSAs by November 28, 2005. The provision of the Service within the Midwest Footprint by November 28, 2005 or shortly thereafter, essentially escalates the connectivity Intrado had otherwise planned to deploy to the rural subscribers of Midwest Wireless by approximately 4 months. (Pursuant to the Intrado Major Market Rollout Schedule, the geographical area covered by the Midwest Footprint, were not scheduled to be deployed by Intrado until March 31, 2006). The Parties are working diligently to provision and data-fill the requisite information in order to provide the Service as soon as possible. Based upon ongoing discussions with Intrado, Midwest Wireless expects to complete testing of the Service by November 29, 2005 and believes the Service will be operation within the Midwest Footprint and selected MSAs by December 12, 2005 at the latest. Accordingly, Midwest seeks a limited extension of the Order's requirements until December 12, 2005.

As requested in the Public Notice dated November 7, 2005, Midwest Wireless responds to the following inquiries set out in the Public Notice:

1. **911 Solution:** A quantification, on a percentage basis, of the number of subscribers to whom the provider is able to provide 911 service in compliance with the rules established in the Order.

- Midwest Wireless is working diligently with Intrado to provide the requisite V911 service. Midwest Wireless fully expects to have full Service connectivity within the Midwest Footprint by December 12, 2005. Accordingly, Midwest Wireless expects that 100% of its subscribers will have access to V911 service in compliance with the Order by December 12, 2005. Presently, 0% of Midwest Wireless subscribers has V911 service compliant with the Order. This is due to that fact that the Midwest Footprint covers heavily rural areas not yet accessible by Intrado, and/or other similar providers.

A. **911 Routing Information/Connectivity to Wireline E911 Networks:**

- As a result of its agreement with Intrado, Midwest Wireless will provide the requisite V911 Service within the Midwest Footprint and have access to an additional 950 PSAPs by December 12, 2005. The attached Major Market Rollout Schedule reflects the deployment schedule contemplated by Intrado, in addition to the rollout of Service within the Midwest Footprint by December 12, 2005. The short delay in providing the Service within the Midwest Footprint is due to its heavily rural nature and inability to achieve access to the necessary selective routers.

B. **Transmission of ANI and Registered Location Information:**

- As a result of its agreement with Intrado, Midwest Wireless will transmit subscribers' ANI and Location Information to all answering points that are capable of receiving the information and accessible by Intrado. Midwest Wireless is capable of transmitting ANI and Location Information to all answering points within the Midwest Footprint that are likewise capable of receiving such information.

**C. 911 Coverage:**

- As a result of its agreement with Intrado, Midwest is working towards nationwide V911 capability in compliance with the Order. (Please see attached Major Market Rollout Schedule). Midwest Wireless has remained focused in the short-term on providing the Service within the Midwest Footprint for the benefit accelerated Service for its rural subscribers.

**2. Obtaining Initial Registered Location Information:**

- At the point of sale, each Midwest oneWave subscriber must identify a PPU within the Midwest Footprint. The appropriate PPU is then transmitted to the Intrado Validation and Update Interface ("VUI"). 100% of Midwest Wireless oneWave subscribers have identified a PPU within the Midwest Footprint.

**3. Obtaining Updated Registered Location Information:**

- Midwest Wireless has provided a service by which subscribers are required to contact Midwest Wireless Customer Care Representative to update Registered Location Information, or PPU. The Customer Care Representative has instant access to the Intrado VUI in order to immediately update a subscriber's Registered Location Information. Midwest Wireless is working towards providing subscribers with the ability to access the Intrado VUI via a Midwest Wireless web portal.

**4. Technical Solution for Nomadic Subscribers:**

- Midwest Wireless is currently exploring the possibility of a solution similar to that advanced by AT&T CallAdvantage – the "Heartbeat Solution." Midwest Wireless is also actively discussing the potential solutions with Intrado which would allow subscribers to have access to the status of connectivity based upon location information.

Midwest Wireless has worked diligently with Intrado to provide Service to its rural subscribers consistent with the Order. By partnering with Intrado and providing unique solutions and technically innovative alternatives, Midwest Wireless has enabled its rural subscribers, within the Midwest Footprint, to have V911 Service capability at least four months ahead of the schedule initially provided by Intrado. Accordingly, Midwest Wireless respectfully requests a limited extension, until December 12, 2005, in order to come into full compliance with the Order.

I thank you for your attention to this matter.

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Respectfully submitted,

Sean R. Simpson

**VERIFICATION**

I, Sean R. Simpson, state that I am the Director of Legal & Regulatory Affairs for Midwest Wireless Holdings L.L.C.; that I am authorized to submit this report on behalf of Midwest Wireless Holdings L.L.C.; that the foregoing filing was prepared under my direction and supervision; and I declare under penalty of perjury that this report is true and correct to the best of my knowledge, information, and belief.

/s Sean Simpson

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